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Environmental Protection Agency
Regulatory Public Docket (7502P), Office of Pesticide Programs
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-0001

RE: Docket ID # EPA-HQ-OPP-2007-0588

To Whom It May Concern:

Aquatic vegetation is a serious problem in our irrigation systems in our North Unit Irrigation District canals. Control of this vegetation is a costly but necessary part of the maintenance of any irrigation system. Without effective control our farmers cannot irrigate. Additionally, water, a precious natural resource, is lost to evaporation, overflow, and seepage.

We use aquatic herbicides because we have to. It is the only economical way to temporarily open the canals and move water in the summer months.

We have used MAGNACIDE H Herbicide in our irrigation district canals for over 30 years. It is the most productive product available to control both vascular plants and algae we have. We have tried other products, but all leave some form of residue. We like using a product that breaks down quickly to naturally occurring materials (carbon dioxide and water).

If we did not have MAGNACIDE H Herbicide available or it was too restrictive to use we would have to return to mechanically controlling our weeds as the other available chemicals will not effectively control the unwanted vegetation and are too expensive to use. We have some small areas that we can't treat now that we have to mechanically clean and it takes a huge amount of time even with two excavators to clean these areas. We have 300 miles of canals and it would be a physical impossibility to keep this amount clean to deliver water. Our costs would skyrocket and would at least double the cost of water to our farmers. Additionally, mechanical control has a detrimental effect on water quality as well as infrastructure.

In over 30 years, we have never found any dead birds in or around a MAGNACIDE application. In over 30 years, we have irrigated 59,000 acres annually to 900 water users with water treated with MAGNACIDE and never caused any crop damage.

We do not supply drinking water. We supply irrigation water. Our systems are not intended to reach a source of drinking water. We have some farmers who grow organic crops. We have a notification list for those farmers who wish to not irrigate during a treatment time. We have never seen any evidence of damage to plants, animals, or birds in all of those years of use.

Irrigation water moving from canal to canal is not a discharge. We have built large tail-water recovery ponds or wetland areas at the ends of any laterals or drains that could eventually possibly discharge to live water.

We are treating irrigation canals. These canals were built by, paid for and maintained for the movement of irrigation water to our growers. They are not fisheries or habitat for endangered species. We dry them up for 5 months out of each year.

We find it difficult to believe that MAGNACIDE H could travel 61 miles. We see aquatic weed control for about 10 to 12 miles in our applications before having to recharge. Since velocity, quantity, species of weeds, water quality, temperature and irrigation practices all play a role in how far a treatment will move, there is no realistic way one can generalize how long a treatment will be active.

There is no chronic exposure to fish. They are either alive or dead. We occasionally see a dead fish following a treatment in our canals, which is unfortunate. However, being realistic, once a fish has entered our irrigation system, they are essentially trapped due to the structures within the delivery system. Once the system is dewatered, the fish will not survive. These are irrigation canals, not fisheries.

We do everything we can to minimize volatilization of this product when we apply. It really stinks; plus any product that volatilizes is wasted. We don't want to waste the product. It is expensive!


Nothing can stay around the vapors, including our applicators if it is not mixing well. To say that birds and wildlife could be killed by exposure to the vapors from an application is unrealistic.

All the comments about direct and indirect affects of using MAGNACIDE H in canals would hold true for any type of aquatic weed control – chemical, mechanical, or just drying up the canal.

Our district follows the label, regulations and every other law applying to the application of pesticides. Applying aquatic herbicides is not as difficult as you would make it out. We move water for a living and understand the complexities of our system. We have used MANGNACIDE H for all these years and have never had an incident of any kind.

Most of our customers use drip or sprinkler irrigation to control the cost of their water. We would not be able to deliver water to our irrigators without MAGNACIDE H. Our farmers irrigation systems would be shut down completely.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Ringering".

Robert Ringering
Secretary-Manager

CC: Anita Winkler
Dale Carpenter